

Jesse Mondry, OSB, #192559  
Harris Bricken Sliwoski, LLP  
511 SE 11th Ave.  
Suite 201  
Portland, OR 97214  
Tel. 503-549-4636  
[Jesse@harrisbricken.com](mailto:Jesse@harrisbricken.com)

Tara J. Plochoki, DC Bar 989404  
Lewis Baach Kaufmann Middlemiss pllc  
1101 New York Avenue NW  
Suite 1000  
Washington DC 20005  
Tel. 202-659-7217  
[tara.plochoki@lbkmlaw.com](mailto:tara.plochoki@lbkmlaw.com)

*Counsel for Petitioner Noalpina Capital Partners I GP S.À.R.L.*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF OREGON**  
**PORTLAND DIVISION**

**IN RE PETITION OF NOALPINA  
CAPITAL PARTNERS I GP S.À.R.L. FOR  
JUDICIAL ASSISTANCE PURSUANT TO  
28 U.S.C. § 1782.**

Case No. 3:23-mc-82 IM

**EX PARTE PETITION FOR JUDICIAL  
ASSISTANCE PURSUANT TO 28 U.S.C.  
§ 1782**

Applicant NOALPINA CAPITAL PARTNERS I GP S.À.R.L. (“Noalpina GP”) hereby petitions the Court ex parte for an order of judicial assistance, pursuant to 28 U.S.C. § 1782, appointing Tara J. Plochoki as a Commissioner of the Court to facilitate the issuance of subpoenas and the gathering of documentary and testimonial evidence from the following Respondents “residing in” or “found in” this district: (1) Tobias Read; (2) Michael Langdon.

The requested relief is for the purpose of obtaining limited, but critical, discovery for use in connection with a foreign civil proceeding currently pending in the Commercial Chambers of

Ex Parte Petition for Judicial Assistance  
Pursuant to 28 U.S.C. § 1782

the Luxembourg District Court, in which Novalpina GP is an interested person, and for a contemplated claim to be filed in the same court. The grounds for this Petition are set forth in the accompanying Memorandum of Law in Support of Petition for Judicial Assistance Pursuant to 28 U.S.C. § 1782 and the Declarations of Nicolas Thieltgen, Michael Zini, and Tara J. Plochocki.

Respectfully submitted,

Dated: January 27, 2023

s/ Jesse D. Mondry  
Jesse Mondry  
HARRIS BRICKEN SLIWOSKI, LLP